ATTACHMENT J.4.38

INSPECTION OF HAZARDOUS WASTE MANAGEMENT UNITS, EW-1015



EW-1015

Effective Date: 05-24-97

Originator (Subje	ect Expert): Buin Z. Wylim	5/15/97
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FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Fluor Daniel Fernald, Inc. P. O. Box 538704 Cincinnati, Ohio 45253-8704

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12. List any items requiring corrective action or unacceptable items reported on prior inspections that have been corrected.

- 13. After inspection is complete, sign, date, and enter badge number on the Inspection Log.
- 14. Forward the Inspection Log to the HWMU Facility Owner. (Point out any potential corrective actions needed.)

HWMU Facility Owner

15. Review HWMU condition from the completed inspection log and provide information in the comments section (and/or by attachment) for any corrective actions needed or completed.

NOTE: Conditions which warrant corrective action may be verified through EC. The inspection Supervisor can assist in coordinating/initiating corrective actions.

- 16. Sign and date the completed inspection.
- 17. Return Inspection Log to HWMU Inspector.

HWMU Inspector

18. Deliver the completed Inspection Logs to Inspection Supervisor by the end of each shift. Point out any required corrective actions.

inspection Supervisor

- 19. Coordinate with the HWMU Facility Owner to initiate corrective actions, if necessary. Ensure that any previously listed corrective actions are being resolved and recorded on future Inspection Logs.
- 20. Forward completed Inspection Logs to Centralized Inspection Group for tracking and review.

Centralized Inspection Group

- 21. Review Inspection Logs for completeness. Return any incomplete inspections to Inspection Supervisor for correction.
- 22. Track logs to verify receipt. Contact Inspection Supervisor if an inspection has not been received.
- 23. Maintain a logbook of non-compliant items and corrective actions until completion (when it will be documented on the subsequent Inspection Log).

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ISSUE AND REVISION SUMMARY

Revision	Date	Description of Issue or Revision
0	05-30-97	New document to convert 20-C-616 into a site procedure per Request No. WR-0396; initiated by B. Huffman. This document replaces 20-C-616, dated 07-05-96, Rev. 1.

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1.0 PURPOSE

This procedure provides the inspection requirements and responsibilities for Hazardous Waste Management Units (HWMUs), mobile lockers storing hazardous/recyclable waste and materials, and special projects that require temporary hazardous waste storage at the Fernald Environmental Management Project (FEMP).

2.0 SCOPE

This procedure applies to all personnel involved in the inspection of active and inactive HWMUs and related components.

3.0 REFERENCES

- 3.1 20-C-606, Hazardous Material Spill Clean-up
- 3.2 20-C-600, Overpacking Defective Containers
- 3.3 EP-0004, Spill Incident Reporting and Clean-up
- 3.4 EW-0015, FEMP RCRA Operating Record

4.0 RESPONSIBILITIES

4.1 <u>Inspection Supervisors</u>

- Maintains a current copy of safety equipment from Attachment G-1 of the RCRA Contingency Plan at those HWMUs that actively store RCRA containers (to be accessible to HWMU Inspectors).
- Maintains a centralized current copy of Attachment G-1 safety equipment for all HWMUs that do not store RCRA containers (accessible to HWMU Inspectors).

NOTE: Current controlled copies of any portion of Attachment G-1 of the RCRA Contingency Plan may be obtained from Environmental Compliance (EC).

- Coordinates with the HWMU Facility Owner to initiate corrective actions.
- Ensures that any listed corrective actions are resolved and/or listed on ensuing Inspection Logs.
- Verifies that the inspections are performed at required frequencies.
- Reviews the HWMU Inspection Logs for completeness to ensure the appropriate signatures, dates, and times are recorded and all item descriptions are checked acceptable, unacceptable, or N/A.

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- Obtains original Inspection Logs from HWMU Inspectors immediately following inspections.
- Ensures that the Operators wear the appropriate respiratory protection and/or additional personal protective equipment (PPE) specified by the work permit for the task being performed.
- Verifies that personnel assigned to HWMU Inspections have documented, current training to this procedure and are qualified to do the work.
- Provides and documents on-the-job training for HWMU Inspectors to ensure familiarity with inspection process.
- Documents all actions taken, including information regarding any spills or leaking containers noted during the inspection period.
- Forwards Inspection Logs to the Centralized Inspection Group.

4.2 HWMU Facility Owners

- Ensures their HWMU is maintained in compliance with applicable RCRA criteria (as listed on the Inspection Log) by reviewing and signing the Inspection Log.
- Provides Inspection Supervisors with responses or planned corrective actions for any non-compliant items noted on the inspection.

4.3 <u>HWMU Inspectors</u>

- Inspects the HWMU in accordance with this procedure and records all observations on the HWMU Inspection Log.
- Provides completed Inspection Logs to the Inspection Supervisors for corrective action and further processing.
- Notifies Inspection Supervisor of non-compliant items found during inspection.

4.4 <u>Centralized Inspection Group</u>

- Collects HWMU Inspection Logs from Inspection Supervisors and tracks the receipt of logs, non-compliant items, and appropriate corrective actions taken.
- Reviews the HWMU Inspection Logs for completeness to ensure the appropriate signatures, dates, and times are recorded and all item descriptions are checked acceptable, unacceptable, or N/A.
- Contacts Inspection Supervisors in the case of incomplete or missing Inspection Logs.

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Forwards completed inspections to EC for review.

4.5 Environmental Compliance (EC)

- Reviews the HWMU Inspection Logs for completeness to ensure the appropriate signatures, dates, and times are recorded and all item descriptions are checked acceptable, unacceptable, or N/A.
- Ensures unacceptable checked items are addressed in the "Comments" section on the HWMU Inspection Log along with any corrective actions as either verified or documented.
- Signs and dates the bottom of the HWMU Inspection Log denoting receipt and transfer to the FEMP RCRA Operating Record.
- Contacts the Centralized Inspection Group for incomplete or missing HWMU Inspection Logs.
- Conducts surveillance at the HWMUs to verify compliance.
- Provides quarterly status reports for management review.
- 4.6 <u>Training Records</u> Provides EC and Centralized Inspection Group with lists of trained, qualified HWMU Inspectors within two working days of each training class.

5.0 GENERAL

5.1 Warnings and Cautions shall precede the Section, Sub-Section, Item, step, or substep to which they apply.

6.0 PREREQUISITES

SAFETY AND HEALTH REQUIREMENTS

- 6.1 Safety glasses shall be worn unless other eye protection is specified by Industrial Hygiene and/or Radiological Control on applicable permits (such as cover goggles, face shields, or respirators).
- 6.2 Cover goggles/face shields, neoprene rubber gloves, and a rubber apron shall be worn when handling caustic, acids, or any other chemical which could cause immediate skin damage upon contact.
- 6.3 PPE specified by the work permit or posted signs shall be worn.
- 6.4 Leather-palm gloves shall be worn when handling drums, operating equipment, and when handling rough/sharp-edges.

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- 6.5 A Confined Space Entry Permit is required for entry into any confined space such as a tank or sump.
- 6.6 Personal safety equipment (listed in the RCRA Contingency Plan) and the required emergency response equipment (listed in Attachment G-1 of the RCRA Contingency Plan) shall be operational and readily available for HWMUs/facilities in use.
- 6.7 Required Safety equipment (as noted in Attachment G-1 of the RCRA Contingency Plan) shall be inspected for availability and good working condition.
- 6.8 A communications device, such as a telephone or hand-held two-way radio, capable of summoning emergency assistance shall be immediately available to persons conducting work/inspections in or around HWMUs. (Device must be operationally tested prior to entering the HWMU.)
- 6.9 Any release of hazardous waste shall be reported immediately per procedure 20-C-606, "Hazardous Material Spill Clean-Up."
- 6.10 Employees shall review and be familiar with the hazards (e.g., chemical physical, biological, and radioactive) that may be encountered at the HWMUs they are inspecting.
- 6.11 Any circumstance that could have resulted in an intake of radioactive materials by inhalation, ingestion, or absorption shall immediately be reported to an area Supervisor. The Supervisor shall immediately report the circumstance of possible radioactive materials intake to Safety and Health (S&H) Radiological Control Department for evaluation. When the suspect isotope is uranium, the involved personnel shall report to the Urine Sampling Station at the end of their shift to complete an Incident Investigation Report (ICR) (Form No. FS-F-1458), and submit an incident urine sample. The involved personnel shall report to the Urine Sampling Station at the start of their next shift to submit a follow-up urine sample. When the suspect isotope is something other than uranium, the involved personnel shall report to the Dosimetry Section of the Radiological Control Department for further determination of actions. Employees are responsible for complying with additional requirements as specified by the Radiological Control Department.
- 6.12 Any situation which could have resulted in the inhalation, ingestion, or absorption of a hazardous material shall immediately be reported to an area Supervisor or to the Assistant Emergency Duty Officer (AEDO), who will immediately report the circumstances to Medical and Industrial Hygiene. The involved personnel shall be directed by the Supervisor or AEDO as to when and where to report for medical evaluation, completion of an Incident Investigation Report (IIR) (Form No. FS-F-1458), and submitting bioassay samples (e.g., blood, urine). Employees are responsible for complying with any additional requirements as specified by S&H.

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7.0 PROCEDURE

7.1 PROVIDING INSPECTION DOCUMENTS

Training Records

 Provide Centralized Inspection Group with a list of trained, qualified HWMU Inspectors within two working days of each training class.

Inspection Supervisor

- 2. Prior to inspection, provide the HWMU Inspector with the following:
 - A. Inspection Log
 - B. Copy of (or access to) Appendix G-1 safety equipment lists
 - C. A list of (or access to) unresolved corrective actions
 - D. A list of (or access to) approved/trained HWMU Inspectors

7.2 COMPLETING AND ROUTING THE APPLICABLE HAZARDOUS WASTE MANAGEMENT UNIT (HWMU) INSPECTION LOG

HWMU Inspector

 Enter name in the top portion of the Inspection Log (See Attachments A through FF):

NOTE: The Inspection Supervisor shall determine if it is necessary to physically enter the HWMU in order to conduct the inspection.

- 2. Conduct inspection in accordance with requirements for the type of HWMU as contained in Table 1, "HWMU Identification."
 - NOTE: The specific inspection requirements for each particular type of HWMU are contained in Sections 7.3 through 7.9.
- Enter a check mark or an N/A (with explanation) in the "Acceptable" or "Unacceptable," as applicable, for each item number.
- 4. Enter a brief description of the observation and corrective action taken in the appropriate column of the Inspection Log, if an item is checked "Unacceptable".

NOTE: The "Comments" Section shall be used if additional space is required.

5. For items deemed unacceptable that pose an imminent hazard, or where a hazard has already occurred, do the following:

Title: INSPECTION OF HAZARDOUS WASTE MANAGEMENT UNITS (HWMUs)

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A. Enter a brief description of the observation and corrective action taken in the appropriate column of the Inspection Log.

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B. Report the items to the Inspection Supervisor.

Inspection Supervisor

C. Contact the Assistant Emergency Duty Officer (AEDO) and the HWMU Facility Owner.

Inspection Supervisor, AEDO, and HWMU Facility Owner

D. Immediately correct the hazard.

HWMU Inspector

- For discrepancies that can be easily corrected (for example, fallen chains), do the following:
 - A. Fix discrepancy.
 - B. Note the discrepancy as corrected in the Comments section of the Inspection Log.
- Check that the following HWMU signs are in place, are readable from 25 feet away, and are in sufficient quantities to be seen from any approach to the HWMU, as required on the individual Inspection Logs:
 - A. DANGER Authorized Personnel Only
 - B. No Smoking, Matches, or Open Flame
 - C. PCB Warning signs (and labeled containers) at PCB storage locations
 - Asbestos Warning signs (and labeled containers) marked with the words "DANGER ASBESTOS CONTAINING MATERIAL" for Material Type 028.
- Record any changes to the configuration of the HWMU or change(s) in type or location of safety equipment (as listed in Attachment G-1 of the RCRA Contingency Plan) at the HWMU in the "Comments" Section of the applicable Inspection Log.
- Ensure the HWMU boundary marker (yellow chain, yellow/magenta rope, yellow paint line, or fencing) is intact and in position.
- 10. Inspect the area in/around the HWMU for debris and/or trash.
- 11. Check that safety equipment, as identified in Attachment G-1 of the RCRA Contingency Plan is available, appears to be functional, and has unobstructed access.

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12. List any items requiring corrective action or unacceptable items reported on prior inspections that have been corrected.

- 13. After inspection is complete, sign, date, and enter badge number on the Inspection Log.
- 14. Forward the Inspection Log to the HWMU Facility Owner. (Point out any potential corrective actions needed.)

HWMU Facility Owner

15. Review HWMU condition from the completed inspection log and provide information in the comments section (and/or by attachment) for any corrective actions needed or completed.

NOTE: Conditions which warrant corrective action may be verified through EC.

The Inspection Supervisor can assist in coordinating/initiating corrective actions.

- 16. Sign and date the completed inspection.
- 17. Return Inspection Log to HWMU Inspector.

HWMU Inspector

18. Deliver the completed inspection Logs to Inspection Supervisor by the end of each shift. Point out any required corrective actions.

Inspection Supervisor

- 19. Coordinate with the HWMU Facility Owner to initiate corrective actions, if necessary. Ensure that any previously listed corrective actions are being resolved and recorded on future Inspection Logs.
- 20. Forward completed Inspection Logs to Centralized Inspection Group for tracking and review.

Centralized Inspection Group

- 21. Review Inspection Logs for completeness. Return any incomplete inspections to Inspection Supervisor for correction.
- 22. Track logs to verify receipt. Contact Inspection Supervisor if an inspection has not been received.
- Maintain a logbook of non-compliant items and corrective actions until completion (when it will be documented on the subsequent Inspection Log).

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24. Retain a backup file copy and forward the original Inspection Log to EC.

NOTE: A copy of the original Inspection Log is acceptable for placement in the FEMP RCRA Operating Record if the original is unobtainable.

Environmental Compliance (EC)

- 25. Review the HWMU Inspection Logs for accuracy and to verify training of HWMU inspection personnel.
- 26. Return any incomplete inspections to Inspection Supervisor for correction.
- 27. Sign and date the bottom of the completed HWMU Inspection Log denoting that the inspection was received and forwarded to the RCRA Operating Record.
- 28. File the Inspection Log(s) in the FEMP RCRA Operating Record per EW-0015.

7.3 INSPECTING CONTAINER STORAGE AREAS FOR ACTIVE AND INACTIVE HWMUs

HWMU Inspector

- Inspect the building/pad condition using the following criteria:
 - A. Check the structural integrity of the pad surface and curbing for cracks and structural failure which would be of a significant nature as to allow a material release to reach the environment.
 - B. Check around the pad for erosion problems and dead vegetation.
 - C. Check around the pad for signs of a release (such as a pool of liquid or stains).
 - D. Check the condition of the ramps.
 - E. Check the building structures for holes in the roof or walls which could allow precipitation to enter the HWMU.
 - F. Record any discrepancies on the Inspection Log.
 - G. Report any discrepancies to the Inspection Supervisor.
- 2. Inspect Secondary Containment Systems of Active and Inactive Container Storage Area HWMUs as follows:
 - NOTE: It is not required that HWMUs with secondary containment that have had hazardous waste removed be pumped out within 24 hours.

 Corrective action only has to take place if the liquid does not appear to be water (such as oil sheen).

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- A. Verify the Containment System is sealed and sufficiently impervious to contain spills, leaks, or accumulated precipitation.
- B. Check for visible unsealed gaps, holes, cracks, or breaks in the floor, curbs, or dikes of the containment system.
- C. Check the drainage features (including sumps, drains, and troughs) for standing or pooled liquids.

NOTE: Standing liquids in HWMUs actively storing waste shall be removed within 24 hours. Inspection Supervisor shall contact the HWMU Facility Owner to arrange for pumping and removal of the liquid.

- D. Check for visible signs of spills (such as liquids, or solid material on the floor and/or stains).
- E. Look for pooled liquids, clogged drains, and/or erosion after a storm.
- F. Record any discrepancies on the Inspection Log.
- G. Report any discrepancies to the inspection Supervisor.

7.4 INSPECTING CONTAINERS WITHIN ACTIVE CONTAINER STORAGE AREA HWMUs

NOTE: Containers that are under evaluation for RCRA determination are subject to a daily outdoor/uncovered inspection or a weekly indoor/covered inspection.

HWMU Inspector

- 1. Check that pallets are stacked securely.
- 2. Check that pallets are stored far enough from the containment edge to prevent waste escaping if a leak occurs in a container.
- 3. Check for containers that are leaking waste, corroded, bulging and/or damaged.
 - A. If a container is damaged, do the following:
 - (1) Classify the container per "Container Inspection Categories" (See Attachment GG).
 - (2) Immediately report containers with Type I characteristics to the Inspection Supervisor and AEDO.
 - (3) Document Type I, II, and III containers on the Inspection Log.

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- NOTE: Hazardous waste markings (labels) on newly generated containers of hazardous waste will only contain the address, EPA Waste ID Codes, and accumulation start date until time of shipment when the remainder of the label will be completed. Backlog containers already in storage will not need the proper shipping name removed until shipment offsite (at that time, label may need to be changed in regards to new HM181 regulations); however, markings (labels) may be changed as time permits.
- 4. Check that containers known to contain hazardous waste have a hazardous waste marking (label) affixed with legible "accumulation start date" entered.
- Check that aisle spacing of at least 24 inches is maintained between rows of containers within storage bays, next to curbs, and between safe mass groupings of RCRA enriched materials.
- 6. Check the height of stacked drums per "Pallet Drum Capacity and Stacking Limits" (See Table 2).
- Record any discrepancies on the Inspection Log.
- 8. Report any discrepancies to the Inspection Supervisor.
- 9. Inspect the Unit Reactivity Group Codes (RGCs) as follows:
 - A. Check that all "Active Container Storage" areas have material RGCs clearly posted at the boundary (such as end of rows, bays, or on building entrances) of each separate material RGC area.
 - B. Inspect the Unit RGCs per the following criteria:
 - (1) Check that containers are marked with a RGC.
 - NOTE: Refer to Attachment HH for the "Hazardous Waste Storage Compatibility Chart."
 - (2) Check for the separation of incompatible material.
 - (3) Ensure that containers of incompatible material are separated by distance or by a physical barrier such as a dike, berm, or wall.
 - (4) For containers that have an RGC or K "Ignitable," the stacking should be in accordance with "NFPA 30" (See Table 3).
- 10. Record any discrepancies on the Inspection Log.
- 11. Report any discrepancies to the Inspection Supervisor.

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7.5 INSPECTING EQUIPMENT

HWMU Inspector

- Inspect the condition of operation equipment in active container storage areas (RCRA Warehouse) per the applicable "FEMP RCRA Warehouse, Building _____ Operation Equipment Log" (See Attachment DD).
- 2. Record any discrepancies on the Inspection Log.
- 3. Report any discrepancies to the Inspection Supervisor.

7.6 INSPECTING ACTIVE ABOVE GROUND RCRA STORAGE TANKS

HWMU Inspector

- 1. Check that tank and auxiliary equipment (stand-pipes, fill pipes, vents, valves, or transfer pumps) are isolated, closed, or locked out.
- 2. Check that lids/manways are locked or have a tamper-proof seal installed.
- 3. Check the tank structure and all associated piping for deterioration (e.g., corrosion, erosion, leaking fixtures/seams) that could affect tank integrity.
- 4. Check the secondary containment per step 2 of Section 7.3.
- 5. Check in and around the unit for erosion, dead vegetation, and signs of material release.
- 6. Check the condition of overfill/spill control equipment.
- 7. Check for the presence of monitoring equipment (such as contact level indicator or high level alarm).
- 8. If no monitoring equipment is installed, a lock-and-tag system should be in use to prevent inadvertent overfilling.
 - NOTE: If tank has undergone closure and is now empty, all of the above criteria would be recorded as "not applicable" (n/a), with the exception of steps 4 and 5 of Section 7.6.
- 9. Check that the words "Hazardous Waste" have been stenciled on the tanks or a hazardous waste label has been attached.
- 10. Record any discrepancies on the Inspection Log.
- 11. Report any discrepancies to the Inspection Supervisor.

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7.7 INSPECTING SURFACE IMPOUNDMENTS

HWMU Inspector

NOTE: Surface impoundments and landfills shall also be inspected after storms have occurred.

 Check that the containment dike/berm will prevent water run-off and run-on during rainfall events.

NOTE: For example, the top of the dike is above the surrounding ground so that rainfall cannot overtop the dike.

- 2. Check around the dike/berm for dead vegetation, which could lead to erosion.
- 3. Check the dike/berm for cracks, holes, breaks, and slumped areas.
- 4. Check for erosion.
- Check the impoundment freeboard daily (and during HWMU inspections) as follows:

NOTE: A separate daily freeboard inspection is not required on the day the HWMU inspection is conducted.

- A. Locate the freeboard indicator.
- B. Check the indicator to determine the freeboard level.
- C. Record the level on the "HWMU Surface Impoundment Daily Freeboard Inspection Log" (See Attachment CC).
- D. Inspect Waste Pit #5 for low water level to ensure that the impoundments bottom material is not exposed. If an exposed area exists, contact supervisor to restore water coverage.
- E. Document freeboard level on Inspection Log and report free board level to Inspection Supervisor.
- 6. Check the sides of the berm, dike, and containment basin for damage and deterioration.
- 7. Check the visible section of liners (if installed) for rips, tears, and seam separation.
- 8. Record any discrepancies on the Inspection Log and provide additional information in the "Comment" Section of the Inspection Log as needed.

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	MANAGEMENT UNITS (HWMUs)	

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9. Report any discrepancies to the Inspection Supervisor.

7.8 INSPECTING PROCESS UNITS

HWMU Inspector

- 1. Check for visible signs of release (such as residues or dead vegetation).
- 2. Check for damage such as broken piping and dented tanks.
- 3. Check for open unit components (such as doors, lids, or ports), which could effect the integrity of the unit or lead to a potential material release.
- 4. If the unit has an associated tank or tanks, perform Section 7.5.
- 5. Record any discrepancies on the Inspection Log.
- 6. Report any discrepancies to the Inspection Supervisor.

7.9 INSPECTING LANDFILLS

HWMU Inspector

- 1. Check the dikes and trenches (run-on, run-off controls) around the unit for deterioration and/or erosion.
- 2. Check that wind dispersal control systems such as rubber panels and hold down pillows (if present) are correctly functioning.
- 3. Inspect the flexible membrane liner for rips, tears, and seam separation.
- 4. Check the overtopping control systems for deterioration/damage (such as broken pipes or damaged dikes).
- 5. Record any discrepancies on the Inspection Log.
- 6. Report any discrepancies to the Inspection Supervisor.

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7.10 INSPECTING SUMPS

HWMU Inspector

- 1. Check the drainage features for standing liquid.
- 2. Check inside the sump for foreign objects.
- 3. Check around the sump and the sump walls for cracks, holes, gaps, and structural defects.
- 4. Check outside the sump perimeter for erosion.
- 5. Check around the sump for dead vegetation, stains, and other signs of a release.

NOTE: In some cases the sump will not pump dry. They almost always have some standing liquid.

6. If the sump is being used as a containment, then check for standing liquid.

NOTE: Notification shall be made to the HWMU Facility Owner and Inspection Supervisor in addition to the entry on the appropriate Inspection Log.

- 7. If standing liquid is found, do the following:
 - A. Immediately notify the Inspection Supervisor.
 - B. Notify the HWMU Facility Owner.
- Record any discrepancies on the Inspection Log.
- 9. Report any discrepancies to the Inspection Supervisor.

7.11 INSPECTING HAZARDOUS WASTE STORAGE LOCKERS

HWMU Inspector

- 1. Check containers to ensure they are stacked securely.
- 2. Check the condition of containers for leaking waste, corrosion, bulges, and/or damage.
 - A. If a container is damaged, do the following:
 - (1) Classify the container per "Container Inspection Categories" (See Attachment GG).

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(2) Immediately report containers with Type I characteristics to the Inspection Supervisor and AEDO.

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- (3) Overpack the container per Procedure 20-C-600, Overpacking Defective Containers.
- (4) Document all Type I, II, and III containers on the Inspection Log.
- 3. Check for visible signs of spills (such as liquids, solid material, or stains on the floor or in the sub-floor containment).
- 4. Check for the separation of incompatible material. (Refer to Attachment HH for the "Hazardous Waste Storage Compatibility Chart").

NOTE: Containers stored in the Hazardous Waste Storage Locker should be marked/labeled as to contents.

- 5. Record any discrepancies on the Inspection Log.
- 6. Report any discrepancies to the Inspection Supervisor.

7.12 INSPECTING SPECIAL PROJECTS UTILIZING TEMPORARY RCRA STORAGE

NOTE: Inspections of special projects are only required if RCRA material is present.

HWMU Inspector

- 1. Determine whether the special project utilizes temporary RCRA storage.
- 2. Do one of the following:
 - A. If the project contains a hazardous waste processing unit, inspect the unit per the criteria in Section 7.8, using an FS-F-4890, Special Project Hazardous Tank/Container/Tanker Truck Inspection (Attachment FF).

<u>OR</u>

B. If the project contains a hazardous waste container storage area, inspect the area per the criteria in Section 7.3 and 7.4, using an FS-F-4890.

OR

- C. If the project is staging a tanker truck and trailer holding hazardous waste, do the following, using an FS-F-4890:
 - (1) Check the integrity of the tanker for corrosion, dents, holes, or leaks.

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- (2) Ensure that the tanker is labeled with a hazardous waste marking or placarding that identifies the contents.
- (3) Verify that lids and manways are closed when not adding or removing waste.
- (4) Check for accessability to spill control equipment.
- (5) Record any non-compliant items on the Inspection Log.
- (6) Report any non-compliant items to the Inspection Supervisor.

8.0 RECORDS

The following documents will be generated as records as a result of this procedure and will be managed according to RM-0022, FEMP Records Management Program Records Management Users Manual and EW-0015, FEMP RCRA Operating Record:

Hazardous Waste Management Unit (HWMU) Inspection Logs

9.0 DRIVERS

- 9.1 DOE Order 5480.19, Conduct of Operations Requirements for DOE Facilities
- 9.2 40 CFR 265, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
- 9.4 40 CFR 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distributing in Commerce, and use Prohibitions
- 9.5 OAC 3745-65, Hazardous Waste Facility Interim Standards
- 9.6 Stipulated Amendment to the Consent Decree (Signed/Dated January 22, 1993)
- 9.7 FEMP Part B Permit Application

10.0 DEFINITIONS

- 10.1 Active Container Storage Areas Units authorized to store RCRA hazardous wastes.
- 10.2 Bulge A swollen area, convex distortion, or outward bend.
- 10.3 Corrosive Aqueous wastes with a pH \leq 2 or \geq 12.5.
- 10.4 <u>Dent</u> A crease, depression, or hollow made by a blow or pressure, or a concave distortion.

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- 10.5 <u>Freeboard</u> The vertical distance between the top of a tank or surface impoundment dike and the surface of the waste contained therein.
- 10.6 <u>Hazardous Waste</u> A waste material listed in 40 CFR 261 or a material that exhibits the characteristic of ignitability, corrosivity, reactivity, or TCLP toxicity.
- 10.7 <u>Hazardous Waste Management Unit (HWMU)</u> An identifiable area where hazardous waste is or has been treated, stored (more than 90 days), disposed of, or systematically released into the environment.
- 10.8 Hazardous Waste Storage Facility Any unit/area where hazardous waste is stored.
- 10.9 <u>Hole</u> An opening that penetrates the container, including breach, gouge, puncture, or leak.
- 10.10 <u>HWMU Inspectors</u> Personnel who have successfully completed the training requirements to inspect HWMUs.
- 10.11 <u>Ignitable</u> Liquid or non-liquid wastes capable of combustion due to heat (flash point less than 140°F), friction, absorption of moisture, or spontaneous chemical changes.
- 10.12 <u>Inactive Container Storage Areas</u> Units that do not presently store hazardous waste but have been previously identified as HWMUs.
- 10.13 <u>Landfill</u> A disposal facility or part of a facility where hazardous waste is placed in or on land.
- 10.14 <u>Mixed Waste</u> Waste containing both radioactive and hazardous components as defined by the Atomic Energy Act and the Resource Conservation and Recovery Act (RCRA), respectively.
- 10.15 <u>Process Unit</u> Equipment that was used during the production years (and no longer active) and meets the definition of HWMU.
- 10.16 <u>Reactive</u> Wastes that respond violently when contacting another substance, forming potentially explosive mixtures or generating toxic gases with water, generating toxic gases (cyanide or sulfide) at pH between 2 and 12.5, or detonating or exploding at standard temperature and pressure or when heated under confinement.
- 10.17 Resource Conservation and Recovery Act (RCRA) The Congressional Act that established safe, environmentally acceptable, strict "cradle to grave" management control and practices for specific hazardous wastes.
- 10.18 <u>Spill</u> Any unplanned event that permits the entry of hazardous waste into the ground, water, or air.
- 10.19 Storm A significant weather event.

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10.20 <u>Surface Impoundment</u> - A topographic depression, man-made excavation, or diked area formed primarily of earthen materials designed to hold liquid hazardous waste or wastes containing free liquids.

10.21 <u>Toxicity Characteristic Leaching Procedure (TCLP)</u> - An analytical process to determine the type and concentration of hazardous contaminants in waste material.

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TABLE 1 - HWMU IDENTIFICATION

(Sheet 1 of 2)

HWMU IDENTIFICATION

HWMU	UNIT	TYPE OF HWMU	SOP SECT.	FREQ OF INSP
1	Fire Training Facility	Landfill	7.8	Annual
2	DELETED			
3	DELETED			
4	Drum Stor Add Near Loading Dock (Lal Bldg)	Inactive Container Storage	7.3.1 and 7.3.2	Quarterly
5	Drum Storage Area South of W-26 (Lab Bldg)	Inactive Container Storage	7.3.1 and 7.3.2	Quarterly
6	DELETED	<u> </u>		<u> </u>
7	DELETED			
8	DELETED			
9	DELETED	·		
10	NAR System Components	Process (With Tanks)	7.7	Weekly
11	Tank Farm Sump	Surfa Labundment	7.6	Annual
12	DELETED			
13	DELETED			
14	Box Furnace	Process Unit	7.7	Weekly
15	Oxidation Furnace No. 1	Process Unit	7.7	Monthly
16	DELETED			
17	Plant 8 East Drum Storage Pad	Inactive Container Storage	7.3.1 and 7.3.2	Quarterly
18	Plant 8 West Drum Storage Pad	Active Container Storage	7.3	Quarterly
19	CP Storage Warehouse (Bldg 56)	Active Container Storage	7.3	Weekly
20	Plant 1 Pad	Active Container Storage	7.3	Weekly
21	DELETED			
22	Abandoned Sump West of Pilot Plant	Sump	7.9	Annual
23	DELETED			
24	DELETED			
25	Plant 1 Storage Bldg (Bldg 67)	Inactive Container Storage	7.3.1 and 7.3.2	Annual

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TABLE 1 - HWMU IDENTIFICATION (cont.) (Sheet 2 of 2)

HWMU NO.	UNIT	TYPE OF HWMU	SOP SECT.	FREQ OF INSP
26	D LETED			
27	Waste Pit No. 4	Landfill	7.8	Monthly
28	Trane Thermal Liquid Incinerator	Process Unit (with Tanks)	7.7	Weekly
29	Plant 8 Warehous (h.ig 80)	Active Container Storage	7.3	Weekly
30	DELETED			
31	DELETED			
32	DELETED		,	Ţ
33	DELETED			
34	KC2 Warehouse (Bldg 63)	Active Container Storage	7.3	Weekly
35	Plant 9 Warehouse (Bldg 81)	Active Container Storage	7.3	Weekly
36	Storage Pad North of Plant 6	Inactive Container Storage	7.3.1 and 7.3.2	Quarterly
37	Plant 6 Warehouse (Bldg 79)	Active Container Storage	7 3	Weekly
38	DELETED			
39	DELETED			
40	DELETED	I		
41	Sludge Drying Beds	Surface Impoundment	7.6	Monthly
42	Waste Pit No. 5 Waste Pit No. 5 Freeboard	Surface Impoundment	7.6	Monthly Daily
43	DELETED			
44	DELETED			
45	DELETED			
46	UNH Tanks (NFS Storage Area)	RCRA Storage Tank	7.5	Annual
47	UNH Tanks (North of Plant 2)	RCRA Storage Tank	7.5	Annual
48	UNH Tanks (SE of Plant 2)	RCRA Storage Tank	7.5	Annual
49	UNH Tanks (Digestion Area, 2 Locations)	RCRA Storage Tank	7.5	Annual
50	UNH Tanks (Raffinate Bldg, 2 Locations)	RCRA Storage Tank	7.5	Annual
51	DELETED			
52	DELETED			
53	DELETED			
54	Thorium Nitrate Tank T2	RCRA Storage Tank	7.5	Annual

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TABLE 2 - PALLET DRUM CAPACITY & STACKING LIMITS

CONTAINER	DRUM/PALLET	MAXIMUM INDOOR STACKING HEIGHT	MAXIMUM OUTDOOR STACKING HEIGHT
85-Gann Overpack	3	3 Pallets	3 Pallets
55-Gallon Drum	4	4 Pallets	3 Pallets
30-Gallon Drum	4	4 Pailets	3 Pallets
10-Gallon Pail	9	7 Pallets	3 Pallets
5-Gallon Pail	16	7 Pallets	3 Pailets
110-Gallon Overpack	2	1 Pallet on Top Pallet of Stack	3 Pallets
White Metal Boxes	N/A	3 High	3 High

NOTE 1: If the container has a RGC of the interple the stacking of containers should be in accordance with NFPA 30. Refer to the MEF for the flashpoint to determine the class (i.e. < 73°F - Class I-A flammable) (See Table 3).

NOTE 2: Stacking four (4) high may also consist of any of the following:

- Three pallets of 55-gallon drums with ather one pallet of 85-gallon drums or one (1) pallet of 110-gallon drums on top.
- Two pallets of 55-gallon drums with two pallets of 85-gallon drums on top.



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TABLE 3 - NFPA 30

E A ACRA Defin	itions	NFPA 30 Definitions	
RCRA Ignitable	Flash Point	NFPA Class I-A Flammable Liquid	Flash Point <73°F Boiling Point <100°F
Liquid (D001)	<140°F	NFPA Class I-B Flammable Liquid	Flash Point < 73°F Boiling Point > 100°F
		NFPA Class I-C Flammable Liquid	Flash Point ≥73°F and <100°F
	IVI	NFPA Class II Combustible Liquid	Flash Point $\geq 100^{0}$ F and $< 140^{0}$ F
	:	NFPA Class III-A Combustible Liquid	Flash Point $\geq 140^{0}$ F and $< 200^{0}$ F
		NFPA Class III-B Combustible Liquid	Flash Point >200°F

Indoor Unprotected Storage of Liquids in Containers

		Container Storage	
Class	Max. Pile Height (ft)	Max. Quant. per Pile (gal)	Ν x. Total Quant.(gal)*
IA	5	660	60
IB	5	1,375	1,375
IC	5	2,750	2,750
<u>II</u>	10	8,250	8,250
ΙПА	15	27,500	27,500
IIIB	15	55,000	55,000

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ATTACHMENT A - HWMU 1, FIRE TRAINING FACILITY

Landfill

inspect	or's Signature:			Badge #:	Date:
нwмі	WMU Facility Owner's gnature:			Badge #:	Date:
Item No.	Item Description	Acceptable	Unacceptable	Observations/Co	orrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Order -No Smoking or Open Flame -Emergency & Prior to Entry				
2	Boundary Markers (e.g., citain, rope)				. <u>-</u>
3	Area Condition				
			P		

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ATTACHMENT B - HWMU 4, DRUM STORAGE AREA NEAR LOADING DOCK (LAB BLDG)

Container Storage Badge #: Date: Inspector's Signatu Badge #: Date: HWMU Facility Owner's Signature: Observations/Corrective Actions To Be Completed Acceptable Unacceptable Item Item Description No. Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact 2 Boundary Markers (e.g., chain, rope) Area Condition Comments:

Environmental Compliance:

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ATTACHMENT C - HWMU 5, DRUM STORAGE AREA SOUTH OF W-26 (LAB BLDG)

pccu	r's Signature:			Badge #:	Date:
VMU	Facility Owner's Signature:			Badge #:	Date:
em o.	Item Description	Acceptable	Unacceptable	Observations/Corre	ective Actions To Be Completed
l	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact				
2	Boundary Markers (e.g., chain, rope)				
3	Area Condition	I V			
nts: _			P		

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ATTACHMENT D - HWMU 10, NAR SYSTEM COMPONENTS

(Sheet 1 of 2)

Process Unit With Tanks

					
Inspector's	s Signature	Badge #:	Date		
HWMU F	faculity Owner's Signature		_	Badge #	Date.
Item No.	Item Description	Acceptable	Unacceptable	Observations/Con	rrective Actions To Be Completed
t	Tank Signs: -Danger-Authorized Personne, Only -No Smoking or Open Flame -Emergency & Prior To Entry Conjact				
2	Surrounding Area & Unit Integrity				
3	Condition Of Secondary Containment	$-\Lambda$ Λ			
4	Safety Equipment				
5	Liquor Coolers E3E-210, E3E-211 & F3E-220 SignsDanger-Authorized Personnel Only -No Smoking Or Open Flame -Emergency & Prior to Entry Contact				
6	Corrosion Or Release Of Waste	<u> </u>			
7	Surrounding Area & Unit Integrity				
8	Weir Box F3E-207, 213, 215, & 218: Signs: -Danger-Authorized Personnel Only -No Smoking Or Open Flame -Emergency Contact				
9	Corrosion Or Release Of Waste				
10	Surrounding Area & Unit Integrity				
11	Spill Response Equipment				
mments	:				
vironme	ental Compliance:		<u> </u>	Date:	

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ATTACHMENT D - HWMU 10, NAR SYSTEM COMPONENTS (Sheet 2 of 2)

Process Unit With Tanks

S

Inspector's	Signature:		Badge #:	Date:		
HWMU Fa	actiny Owner's Signature:		Badge #:	Date:		
ltem No.	Item Acceptable Description	Unacceptable	Observations/	orrective Actions To Be Completed		
12	Designation Pot G3E-207: Signs. Danger-Autorized Personne: Only No Smoking or Open Flame -Emergency Contract	4				
13	Overfill/Spill Control Equipment			- <u></u>		
14	Monitoring Equipment In Place (Content Level)					
15	Surrounding Aren & Unit Integrity			<u>.</u>		
:6	Condition Of Secondary Containment					
;•	Safety Equipment					
18	Boundary Markers (e.g., chain, rope)					
:9	Emergency & Spill Response Equipment					
20	Manway/Fill Pipe Seals Unbroken					
Commer	Comments:					
Environ	mental Compliance:		Date:			

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ATTACHMENT E - HWMU 11, TANK FARM SUMP

		TANK	FARM SUMP		Impoundment
Inspecto	or's Signature:	<u>. </u>		Badge #:	Date:
HWMI	Facility Owner's Signature:			Badge #:	Date:
Item No.	Item Description	Acceptable	Unacceptable	Observations	Corrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flaine -Emergency & Prior to Entry Contact				
2	Sump Drainage		2 2 5 3		
3	Area Condition	IV			
4	Boundary Markers (e.g., chain.		*******		
Comm	ents:			<u> </u>	
			<u> </u>		
_	<u></u>				
Enviro	onmental Compliance:	<u></u>	·	Date:	
FS-F-3616	.REV 04/03.97)			!	

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ATTACHMENT F - HWMU 14, BOX FURNACE

							Process Unit
	S						
Inspecto	or's Signature:			Badge #:		Date:	
HWMU	J Facility Owner's Signature:	_		Badge #:		Date:	
Item No.	Item Description	Acceptable	Unaccepta	able	Observations/	Corrective Actions T	o Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact	N /					
2	Boundary Markers (e.g., chain, rope)	IV		. <u>-</u>			
3	Unit Condition	<u></u>					
4	Visible Signs Of Material Release			_			
5	Safety Equipment					<u>.</u>	
6	Spill Response Equipment						
Сомли	ents:						
Enviro	onmental Compliance:				Date:		-

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ATTACHMENT G - HWMU 15, OXIDATION FURNACE NO. 1

Process Unit

<u></u> -					
Inspecto	or's Signature:	Badge #:	Date:		
HWMU	Facility Owner's Signature:	Badge #: Date:			Date:
Item No.			Unacceptable	Observations/Corrective Actions To Be Complete	
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact				
2	Boundary Markers (e.g., chain, rope)	IV			
3	Unit Condition				
4	Visible Signs Of Material Release				
5	Safety Equipment				
6	Spill Response Equipment				
Comme	ents;				
_	<u></u>			608 8	
Enviro	nmental Compliance:			Date:	

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ATTACHMENT H - HWMU 17, PLANT 8 EAST DRUM STORAGE PAD

Badge #: Inspector's Signature: Date: Badge #: HWMU Facility Owner's Signature: Date: Observations/Corrective Actions To Be Completed Acceptable Unacceptable Item Item Description No. Signs: ı -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact Boundary Markers (e.g., chain, 2 rope) 3 **Pad Condition** 4 Area Condition Safety Equipment 5 Visible Signs Of Material Release Comments: Date: Environmental Compliance:

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ATTACHMENT I - HWMU 18, PLANT 8 WEST DRUM STORAGE PAD

Container Storage Inspector's Signature: Badge #: Date: Badge #: Date: HWMU Facility Owner's Signature: ltem Item Acceptable Unacceptable Observations/Corrective Actions To Be Completed No. Description -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact 2 Boundary Markers (e.g., chain, rope) **Pad Condition** 3 4 **Area Condition** Safety Equipment 5 Visible Signs of Material Release Comments: _ Date: Environmental Compliance:

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ATTACHMENT J - HWMU 19, CP STORAGE WAREHOUSE (BLDG 56)

Date: Badge #: Inspector's Signature: Date: HWMU Facility Owner's Signature: Badge #: Observations/Corrective Actions To Be Completed Acceptable Unacceptable Item Item No. Description 1 Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact 2 **Building Condition** Condition of Secondary Containment 3 4 Emergency & Spill Response Equipment Compatibility Codes 5 Container Management 6 7 Conditions Of Drums (Evidence Of Leaks Or Spills) 8 Safety Equipment Comments: _ Date: Environmental Compliance:

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ATTACHMENT K - HWMU 20, PLANT 1 PAD

Active Container Storage

Inspect	or's Signature:			Badge #:		Date:
нwми	J Facility Owner's Signature:		. 	Badge #:		Date:
Item No.	ltem Description	Acceptable	Unacceptable		Observations	Corrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact					
2	Building Condition					
3	Pad Condition	IVI				
4	Condition of Secondary Containment			_		
5	Safety Equipment		200000000000			
6	Emergency & Spill Response Equipment					
7	Compatibility Codes			ĺ		
8	Container Management					
9	Conditions Of Drums (Evidence Of Leaks Or Spills)				<u></u>	
10	Boundary Markers (e.g., chains, rope)					
Comm	ents:					
Enviro	nmental Compliance:			Date		

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ATTACHMENT L - HWMU 22, ABANDONED SUMP WEST OF PILOT PLANT

Badge #: Date: Inspector's Signature: Badge #: Date: HWMU Facility Owner's Signature: Observations/Corrective Actions To Be Completed Acceptable Unacceptable Item Item No. Description 1 Signs: -Danger-Authorized Personnel Only -Emergency & Prior to Entry Contact 2 Boundary Markers (e.g., chain, rope) 3 Area Condition Comments: Environmental Compliance:

FS-F-3627 (REV 04/03/97)

Compliance with this procedure is mandatory while performing the activities within its scope. Only a controlled copy may be used in the performance of work.

FS-F-3630 (REV. 04 03 97)

DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

Inactive Container

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ATTACHMENT M - HWMU 25, PLANT 1 STORAGE BUILDING (BLDG 67)

Storage Date: Badge #: Inspector's Signature: Badge #: Date: HWMU Facility Owner's Signature: Observations/Corrective Actions To Be Completed Unacceptable Acceptable Item Item No. Description 1 Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact Boundary Markers (e.g., chain, Area Condition 3 Comments: _ Date: Environmental Compliance:

Compliance with this procedure is mandatory while performing the activities within its scope. Only a controlled copy may be used in the performance of work.

DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

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ATTACHMENT N - HWMU 27, WASTE PIT NO. 4

Landfill

Inspecto	or's Signature:	Badge #:	Date:					
HWMU	HWMU Facility Owner's Signature:				Date:			
ltem No.	Item Description	Acceptable	Unacceptable	Observations/Corre	ctive Actions To Be Completed			
l	Signs: -Danger-Authorized Personnel Og -No Smoking or Open Flame -Emergency & Prior to Entry Contact							
2	Boundary Markers (e.g., chain, rope)							
3	Condition of Soil at Edge of flexible membrane liner (FML) (soil erosion should not expose FML below grade)	IV						
4	Condition of Anchor Trenches .FML should be securely unchored in trench)				<u></u>			
5	Condition of Field Seams (tears)							
6	Condition of Factory Seams (tears)							
7	Condition of FML Panels (holes)							
8	Condition of Hold-Down Pillows (secure)							
9	Walk Over Monthly Inspection							
Comme	ents:							
Enviro	Environmental Compliance: Date:							

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

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ATTACHMENT O - HWMU 28, TRANE THERMAL LIQUID INCINERATOR

Process Unit (With Tanks)

				(With Falles)
or's Signature:	Badge #:	Date:		
Facility Owner's Signature:			Badge #:	Date:
Item Description	Acceptable	Unacceptable	Observations/Corre	ctive Actions To Be Completed
Signs: -Danger-Authorized Personnel Omy -No Smoking or Open Flame -Emergency & Prior To Entry Contact	•			
Boundary Markers (e.g., chain, rope)	N /			
Area Condition (Evidence of Leaks)	IV			
Bldg. 39A Condition				
Tank F3E-406: Overfill'Spill Control Equipment				
Secondary Containment Condition				
Tank Condition or Release Of Waste				
Monitoring Equipment				
Safety Equipment			菱	
ents:				
·				
				·
-				·····
nmental Compliance:	Date:			
	Item Description Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact Boundary Markers (e.g., chain, rope) Area Condition (Evidence of Leaks) Bidg. 39A Condition Tank F3E-406: Overfill'Spill Control Equipment Secondary Containment Condition Tank Condition or Release Of Waste Monitoring Equipment Safety Equipment	Item Description Signs: -Danger-Authorized Personnel Offly -No Smoking or Open Flame -Emergency & Prior To Entry Contact Boundary Markers (e.g., chain, rope) Area Condition (Evidence of Leaks) Bidg. 39A Condition Tank F3E-406: Overfill'Spill Control Equipment Secondary Containment Condition Tank Condition or Release Of Waste Monitoring Equipment Safety Equipment	Item Description Signs: -Danger-Authorized Personnel Offly -No Smoking or Open Flame -Emergency & Prior To Entry Contact Boundary Markers (e.g., chain, rope) Area Condition (Evidence of Leaks) Bidg. 39A Condition Tank F3E-406: Overfill Spill Control Equipment Secondary Containment Condition Tank Condition or Release Of Waste Monitoring Equipment Safety Equipment	Facility Owner's Signature: Badge #:

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

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ATTACHMENT P - HWMU 29, PLANT 8 WAREHOUSE (BLDG 80)

Active Container Storage

specto	or's Signature:	Badge #:	Date:		
WMU	Facility Owner's Signature:	Badge #:	Date:		
tem No.	Item Description	Acceptable	Unacceptable	Observations/	Corrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact				
2	Building Condition				
3	Condition of Secondary Containment				
4	Safety Equipment				<u>=</u>
5	Emergency & Spill Response Equipment				
6	Compatibility Codes				
7	Container Management				,
8	Conditions of Drums (Evidence of Leaks/Spills)				40
Comme	ents:				
_					
					
				Date:	

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

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ATTACHMENT Q - HWMU 34, KC-2 WAREHOUSE (BLDG 63)

Active Container Storage

inspector's Signature:				Badge #:	Date:	
HWMU	J Facility Owner's Signature:			Badge #:	Date:	
ltem No.	Item Description	Acceptable	Unacceptable	Observations/Correc	ctive Actions To Be Completed	
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact	IN				
2	Building Condition					
3	Condition Of Secondary Containment	IV				
4	Emergency & Spill Response Equipment					
5	Compatibility Codes					
6	Container Management					
7	Conditions of Drums (Evidence Of Leaks/Spills)					
8	Safety Equipment					
Сотт	ents:					
		<u>.</u>		<u></u>		
					of source -	
Enuro	nmental Compliance:	-		Date:		

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

Active Container Storage

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ATTACHMENT R - HWMU 35, PLANT 9 WAREHOUSE (BLDG 81)

Badge #: Date: Inspector's Signature: Badge #: Date: HWMU Facility Owner's Signature: Acceptable Unacceptable Observations/Corrective Item Item **Actions To Be Completed** Description No. 1 Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact **Building Condition** 2 3 Condition Of Secondary Containment 4 Safety Equipment Emergency & Spill Response 5 Equipment 6 Compatibility Codes 7 Container Management 8 Conditions of Drums (Evidence Of Leaks/Spills) Comments: Date: Environmental Compliance:

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FS-F-3641 (REV: 04/03/97)

DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

Inactive

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ATTACHMENT S - HWMU 36, STORAGE PAD NORTH OF PLANT 6

Container Storage Date: Inspector's Signature: Badge #: HWMU Facility Owner's Signature: Badge #: Date: Acceptable Unacceptable Observations/Corrective Actions To Be Completed Item Item Description NO. 1 -Danger-Authorized Personnel Only -Emergency & Prior to Entry Contact Boundary Markers (e.g., chain, rope) 3 **Area Condition** Comments: Date: Environmental Compliance:

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

Revision No. 0

Active

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ATTACHMENT T - HWMU 37, PLANT 6 WAREHOUSE (BLDG 79)

	S				Container Storage
Inspect	or's Signature:			Badge #:	Date:
HWMU Facility Owner's Signature:				Badge #:	Date:
Item No.	Item Description	Acceptable	Unacceptable	Observations/Correct	tive Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact		1		
2	Building Condition				
3	Condition Of Secondary Containment				
4	Spill Response Equipment				
5	Compatibility Codes		**************************************		
6	Container Management				
7	Conditions of Drums (Evidence Of Leaks/Spills)				
8	Safety Equipment			<u> </u>	
Comm	ents:				
Enviro	nmental Compliance:			Date:	

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DOCUMENT NO: EW-1015

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Surface

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ATTACHMENT U - HWMU 41, SLUDGE DRYING BEDS

					Impoundment
Inspect	or's Signature:	Badge #	Date:		
нwмц	Facility Owner's Signature:			Badge #:	Date:
Item No.	Item Description	Acceptable	Unacceptable	Observations/Corre	ective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -Emergency & Prior To Entry Contact				3 (3 (3 (3 (3 (3 (3 (3 (3 (3 (3 (3 (3 (3
2	Boundary Markers (e.g., chain, rope)				
3	Unit Condition (Dike/Liner)				
4	Area Condition				
5	Safety Equipment		3000000000000		
6	Visual Evidence Of Material Release				
					<u> </u>
Comme	ents:		<u></u>		
				- 	
					
				1	
Enviro	nmental Compliance:	Date:			

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ATTACHMENT V - HWMU 42, WASTE PIT NO. 5

Surface Impoundmen

			<u> </u>		Impoundment		
Inspecto	or's Signature.	Badge #:	Date:				
HWMU	Facility Owner Signature:		_	Badge #:	Date:		
Item No.	Item Description	Acceptable	Unacceptable	Observations/Correc	tive Actions To Be Completed		
1	Signs: -Danger-Authorized Personnel Onl -No Smoking or Open Flame -Emergency & Prior To Entry Contact						
2	Boundary Markers (e.g., chain, rope)		•				
3	Unit Condition (Dike/Liner)						
4	Bottom Material Exposed						
5	5 Area Condition						
6	Safety Equipment						
7	Visual Evidence Of Material Release			<u> </u>			
8	Estimated Freeboard Level	Feet:	niches:				
9	Secondary Containment Condition						
10	Emergency and Spill Response Equipment						
Comments:							
NOTE	NOTE: Items 1 through 9 - Weekly inspection required; Items 10 through 12 - Daily inspection required.						
Enviro	nmental Compliance:	Date:					

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

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RCRA

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ATTACHMENT W - HWMU 46, UNH TANKS (NFS STORAGE AREA)

(Tanks F2-605, 606, 607, 608, 02-E004A-Tank)

Storage Tank Date: Inspector's Signature: Badge #: Badge #: HWMU Facility Owner's Signature: Date: Observations/Corrective Actions To Be Completed Item Item Acceptable Unacceptable No. Description 1 Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact Surrounding Area And Unit 2 Integrity Secondary Containment Condition 3 4 Safety Equipment Boundary Markers (e.g., chain, rope) Comments: Date: Environmental Compliance:

F\$-F-3651 (REV. 04/03 97)

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ATTACHMENT X - HWMU 47, UNH TANKS (NORTH OF PLANT 2)

(Tanks F2E-5, F2E-6, & F2E-8)

	S	.		 '	RCRA Storage Tai
Inspecto	or's Signature:			Badge #:	Date:
нумі	Facility Owner's Signature:		Badge #:	Date:	
Item No.	Item Acceptable Unacceptable Description		Unacceptable		Observations/Corrective Actions To Be Completed
Ĺ	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact				
2	Surrounding Area And Unit Integrity				
3	Secondary Containment Condition	IV			
4	Safety Equipment				
5	Boundary Markers (e.g., chain, rope)				
Comme	ents:				
Enviro	nmental Compliance:			Date:	

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ATTACHMENT Y - HWMU 48, UNH TANKS (SOUTHEAST OF PLANT 2)

(Tanks F3E-223)

					KCKA Storage Tank
Inspect	or's Signature:			Badge #:	Date:
HWMU	Facility Owner's Signature:	Badge #:	Date.		
Item No.	ltem Description	Acceptable	Unacceptable	Observations, Corr	ective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact				
2	Surrounding Area And Unit Integrity				
3	Secondary Containment Condition				
4	Safety Equipment				
5	Boundary Markers (e.g., chain, rope)				
Comme	ents:				
Епуто	nmental Compliance:			Date:	
	,REV. 04/03 97)				

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DOCUMENT NO: EW-1015

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RCRA

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ATTACHMENT Z - HWMU 49, UNH TANKS (DIGESTION AREA, 2 LOCATIONS)

(Tanks D1-1, 2, 4, 7, 10 F1-1, 25, 26)

					Storage Ta
Inspect	or's Signature:			Badge #:	Date:
HWMU	Facility Owner's Signature:	Badge #:	Date:		
Item No.	ltem Description	Acceptable	Unacceptable	Observations	s/Corrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact				
2	Surrounding Area And Unit Integrity				
3	Secondary Containment Condition	IV			
4	Safety Equipment				
5	Boundary Markers (e.g., chain, rope)				
Comme	ents:				
	<u> </u>				·
		<u></u>			
Enviro	nmental Compliance:			Date:	

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

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ATTACHMENT AA - HWMU 50, UNH TANKS (RAFFINATE BLDG, 2 LOCATIONS)

(Tanks F1-301, 302, 303 & 308)

					Storage Tank
Inspector's Signature: HWMU Facility Owner's Signature:				Badge #:	Date:
				Badge #:	Date:
Item No.			Unacceptable	Observations/Corre	ective Actions To Be Completed
-	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior To Entry Contact		<u></u>		
2	Surrounding Area And Unit Integrity				
3	Secondary Containment Condition	_ I W			
4	Safety Equipment				
5	Boundary Markers (e.g., chain, rope)				
Comme	ents:				
		0.1-4-			
Enviro	nmental Compliance:			Date:	

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FS-F-4885 (REV 04/03/97)

DOCUMENT NO: EW-1015

Effective Date: 05/24/97

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RCRA

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ATTACHMENT BB - HWMU 54, THORIUM NITRATE TANK (T2)

Storage Tank Date: Badge #: Inspector's Signature: Date: Badge #: HWMU Facility Owner's Signature: Observations/Corrective Actions To Be Completed Acceptable Unacceptable Item Ítem No. Description I Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -HWMU Facility Owner and **Emergency Information** Boundary Markers (e.g., chain. Condition of Area 3 Secondary Containment Condition Comments: _ Date: Environmental Compliance:

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

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ATTACHMENT CC - HWMU SURFACE IMPOUNDMENT DAILY FREEBOARD INSPECTION LOG

Inspector's	Signature:				Badge #:		Date:
HWMU Fa	cility Owner's Signatur	:			Badge #:	odge #: Date:	
HWMU No.	HWMU Location	Tim	Freeboard Level (Feet/Inches)	Acceptable	Unacceptable		
42	Waste Pit #5		1				
Comments:					Dage:		
Environme	ntal Compliance:				Date:	<u> </u>	
FS-F-4886 (REV	G4 C3.97)						

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DOCUMENT NO: EW-1015

Effective Date: 05/24/97

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ATTACHMENT DD - FEMP RCRA WAREHOUSE, BUILDING	OPERATION EQUIPMENT LOG
(Sheet 1 of 2)	

Inspector's	S.gnature	·		Badge	,	Date:
HWMC Fa	acility Owner's Stature:			Badge	#	Date.
lt em No.	Item Description	Acceptable	Unacceptable		Observations	Corrective Actions To Be Completed
·	Procedures Available For All Equipment Used and Processes Conducted In RCRA Warehouse					
2	All PM Inspections Conducted Per Applicable Procedure					
3	Scale: Da.s PM Inspection Conducted			•		
	Current Calibration Sticker Present					
	Platform Guard In Place	 \				<u> </u>
	Printer Operational	<u>I_</u>	麗			
	Check Weights Serviceable (Have Current PM Date)					
1	Forktruck: Daily PM Inspection Conducted					
	Form FS-F-2414 Completed					
	Current PM Card Present	· · <u>-</u>				
5	Hoist, Crane: Daily PM Inspection Conducted					
	Form FMPC-H&S-2423 Completed				1	
	Current PM Tag Present					
	Equipment Weight Capacity Not Exceeded By Load Weight					
Comme	nts:		<u> </u>		<u> </u>	
						
Environ	mental Compliance:	· · · · · · · · · · · · · · · · · · ·			Date:	

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ATTACHMENT DD - FEMP RCRA WAREHOUSE, BUILDING	OPERATION EQUIPMENT LOG (cont.
(Sheet 2 of 2)	

Inspector	r's Signature:			Badge #:	Date:
HWMU	Facility Owner's Signature:			Badge #	Date:
ltem No.	Item Description	Acceptable	Unacceptable	Observations/Corre	ective Actions To Be Completed
6	Hand Stacker/Pallet Jack: Daily PM Inspection Conducted				
	Form FMPC-SAML-2415 Completed				
7	Current PM Tag Present	Λ			
8	Drum Lift & UHLD: Current PM Tag Present				
	Daily PM Inspection Conducted (Damaged/Missing Hardware)				
•)	Flammable Liquid Cabinets: Positioned On Level Surface				
,	Vent Port Capped Unless Using A Vent Fan Adapter)				
	Cabinet Properly Grounded				
	No Combustible Materials Stored In/Around Cabinets				
Comme	nts:				
	·				
				<u> </u>	
Environ	mental Compliance:		· -	Date:	

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FS-F-4889 (REV. 04/11/97)

DOCUMENT NO: EW-1015

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Storage Locker Clean Side

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ATTACHMENT EE - HAZARDOUS WASTE STORAGE LOCKER (CLEAN SIDE)

					,, 5. 16.	ss than 90-day storage
Inspecto	r's Signature:			Badge #:		Date:
HWMU	Facility Owner's Signature:			Badge #:		Date:
ltem No.	Item Description	Acceptable	Unacceptable	e O	bservations/Corre	ctive Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact	N A				
2	Locker Condition					
3	Condition of Secondary Containment			ļ		
4	Emergency & Spill Response Equipment					
5	Compatibility Codes					
6	Container Management					
~	Condition of Drums (Evidence of Leaks/Spills)					
8	Safety Equipment					
mments						
vironme	ntal Compliance:			Date:		

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ATTACHMENT FF - SPECIAL PROJECT HAZARDOUS TANK/CONTAINER/TANKER TRUCK INSPECTION (Sheet 1 of 2)

ECT NA	AME:					
Inspecto	or's Signatum:			В	adge #:	Date:
Project	Engineer's Signature:	<u></u>		В	adge #	Date:
HWMU	Facility Owner's Signature:			В	adge #	Date:
Item No.	Item Description	Acceptable	Unaccepta	ble	Observations/Correcti	ve Actions To Be Completed
	DRARY TANK STORAGE nk Numbers & Location(s):	·-··				
1	Overfill/Spill Control Equipment					
2	Corrosion or Release of Waste					
3	Monitoring Equipment in Place (Content Level)					
4	Surrounding Area Condition & Unit Integrity		_			
5	Secondary Containment Condition					
6	Accumulation of Precipitation in Secondary Containment: (See Note Below)					
7	Manway Closed (Except When Adding or Removing Waste):					
8	Sump Pump Switch Position (Should be "off")			j		
9	Tank has 'Hazardous Waste' Marking (Label) Affixed					
	STORAGE AREA ocation(s):			- 1		
1	Drums have "Hazardous Waste" Marking (Label) Affixed					
2	Corrosion, Holes, Dents, Bulges, or Leaks:					=
3	All Drums Closed Except When Adding or Removing Waste			•		
4	Spill Response Equipment					
5	Secondary Containment Equipment					

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Date:

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ATTACHMENT FF - SPECIAL PROJECT HAZARDOUS TANK/CONTAINER/TANKER TRUCK INSPECTION (cont.) (Sheet 2 of 2)

Item No.	Item Description	Acceptable	Unacceptable	Observations/Corrective Actions To Be Completed
	ER TRUCK AND TRAILER cation(s):			
ı	Labeled with "Hazardous Waster Marking			
2	Corrosion, Holes, Dents, Bulge, on Leaks:			
3	Lid/Manway Closed Except When Adding or Removing Waste			
4	Spill Response Equipment			
E : H/	spection of special projects is only required when AZARDOUS WASTE CONTAINERS STORED OF E INSPECTED WEEKLY. TANKER TRUCKS M	UTDOORS MUST B	E INSPECTED DAI	LY. INDOOR DRUMS AND STAGING AREAS MO
E: H/ BE E: RI PF	AZARDOUS WASTE CONTAINERS STORED OF E INSPECTED WEEKLY. TANKER TRUCKS M EMOVE ACCUMULATIONS OF PRECIPITATION	UTDOORS MUST B UST BE INSPECTE ON IN SECONDARY	E INSPECTED DAI	PRIOR TO PROJECT START-UP EACH DAY. IF T
E: H/ BE TE: RI PF AJ	AZARDOUS WASTE CONTAINERS STORED OF E INSPECTED WEEKLY. TANKER TRUCKS M EMOVE ACCUMULATIONS OF PRECIPITATION ROJECT IS NOT OPERATIONAL (i.e., WEEKEN	UTDOORS MUST B UST BE INSPECTE ON IN SECONDARY IDS/HOLIDAYS), PI	E INSPECTED DAI	LY. INDOOR DRUMS AND STAGING AREAS MU PRIOR TO PROJECT START-UP EACH DAY. IF T IALL BE REMOVED WHEN THIS LEVEL EXCEEN
E: H/ BE TE: RI PF AJ	AZARDOUS WASTE CONTAINERS STORED OF INSPECTED WEEKLY. TANKER TRUCKS MEMOVE ACCUMULATIONS OF PRECIPITATION OF THE STORE OF PROJECT IS NOT OPERATIONAL (i.e., WEEKEN PPROXIMATELY ONE INCH.	UTDOORS MUST B UST BE INSPECTE ON IN SECONDARY IDS/HOLIDAYS), PI	E INSPECTED DAI	PRIOR TO PROJECT START-UP EACH DAY. IF T

FS-F-4890 (REV 04 11/97)

Environmental Compliance:

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ATTACHMENT GG - CONTAINER INSPECTION CATEGORIES

TYPE	CHARACTERISTIC		CORRECTIVE ACTION
1	Material Sowing from the container	1.	Notify the Inspector Supervisor.
	with an accomulation on the pallet or pad.		The Supervisor shall notify the AEDO.
		2.	Immediately stop or contain the leak.
	A	3.	Supervisor records on the inspection log that the required action has been completed.
		4.	Complete additional cleanup as necessary.
11	Material on the container exterior	1.	Record the leak on the inspection log.
	only; no material on the pallet or pad.	4	Notify the Inspector Supervisor.
		VI	The Supervisor shall notify the AEDO (see EP-0004, "Spill Incident Reporting and Cleanup). The Supervisor shall review the completed inspection logs to practize containers for transfer to the overpacking area and subsequent mitigation.
Ш	The container exterior is discolored	1.	Record the condition on the inspection log.
	with visible contamination; no material release.	2.	Notify Inspector Supervisor.
	Severe corrosion with deep pitting and/or metal flaking. Dents and/or bulges which affect container to the degree of potential release.		The drum requires disposition as directed by the Supervisor.



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ATTACHMENT HH - HAZARDOUS WASTE STORAGE COMPATIBILITY CHART

REACTIVITY GROUP DESCRIPTION	RGC CODE (1)	А	В	С	D	E	F	G	Н	1	J	К	L	М
HALOGEN TED ORGANICS AND PCBs	А	Х	Х	0	0	Х	Х	X	0	0	0	Х	0	0
ALCOHOLS AND COMBUSTIBLES	В	X	Х	0	0	X	×	X	X	0	0	X	0	0
MINERAL ACIDS + CORROSIVES		0	0	Х	0	0	0	0	0	0	0	0	0	0
CAUSTICS	D		0	0	X	0	0	0	0	o	0	0	0	0
TOXICS AND TCLP METALS	E	Х	X	0	0	Х	Х	Х	Х	0	0	Х	0	0
FLUORIDES	F	×		0	0	×	х	х	х	0	0	Х	0	0
WATER MIXTURES	G	×	1	V	0	х	×	х	×	0	0	х	0	0
CYANIDES	Н	0	X	O	0	Х	Х	Х	Х	0	0	х	Ó	o
OXIDIZERS	1	0	0	0	0	0	0	0	0	Х	0	0	0	0
REACTIVES	J	0	0	0	0	0	0	0	0	0	х	0	0	0
IGNITABLE	К	Х	Х	0	0	X	X	Х	Х	0	<u></u>	X	0	0
PEROXIDES	L	0	0	0	0	0_	0	0	0	0	0	0	×	0
EXPLOSIVES	М	0	0	0	0	0	0	0	0	0	0	0	0	x

(1) An "X" indicates a compatible combination, and an "O" indicates an imporpatible combination.